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June 14, 2007

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Honorable Stephen C. Robinson
United States District Judge
Southern District of New York
United States Courthouse, Room 633
300 Quarropas Street
White Plains, New York 10601-4150

MEMO ENDORSED

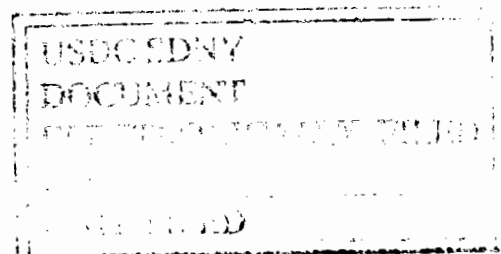
Re: Encompass Insurance Co. a/s/o Juan Polanco and Martina Fernandez
v. DeLima Contractors, Inc., et. al.
Civil Action No.: 07 CV 3857
Our File No.: 167575

Dear Judge Robinson:

As Your Honor may be aware, Cozen O'Connor represents the plaintiff, Encompass Insurance Company in the above-referenced matter. I am writing for the purpose of requesting an extension of time to submit a proposed Scheduling Order to the Court. Please note that this is our firm's first request for an extension of time in this case.

I am making the above request because we are still attempting to serve one of the three defendants with the Summons and Complaint. Furthermore, all of the named defendants have yet to appear in the lawsuit. As such, I have been unable to consult with counsel for all of the parties regarding the dates to incorporate into the proposed Scheduling Order.

In light of the foregoing, I respectfully request that the Court extend the deadline for submission of a proposed Scheduling Order and reschedule the Initial Case Management Conference in this case. In this regard, please note that I will be out of the country from July 16th to July 30th. As such, I respectfully request that the proposed Scheduling Order deadline be extended from June 15th to August 3rd and that the Initial Case Management Conference be adjourned from July 29th to August 17th.



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Your Honor's time and consideration are greatly appreciated.

Very truly yours,

COZEN O'CONNOR

John B. Galligan
By: John B. Galligan

JBG/kw

The initial pretrial conference in
this matter is rescheduled for
Fri., Sept. 7, 2007 at 10:00 a.m.
The parties shall submit the proposed
scheduling order to the Court
by August 24, 2007.

APPLICATION GRANTED

Stephen C. Robinson

HON. STEPHEN C. ROBINSON

6/15/07